# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

v.

ELADIE I CITAO C. . . . CT 1

ELAINE L. CHAO, Secretary of Labor, United States Department of Labor

Plaintiff,

Civil Action

File No. 05-6786 (Jones, USDJ; Eaton, USMJ)

AMENDED COMPLAINT

LMC also known as Lage Management Corporation,
Atlantic Auto Care Center, Inc., Boston Road Lube, Inc.,
Boulevard Car Wash of N.Y., Inc., Bronx River Lube, Inc.,
First Avenue Lube Corp., Michael's Car Wash, Inc.,
Midnight Express Lube, Inc., 613 Car Wash Corp.,
and JOHN LAGE, Individually and as President;
VIP Wash & Lube, Inc., Valdemiro Santos,
Individually and as President of VIP Wash & Lube, Inc.,
Tremont Car Wash, Inc., Webster Car Wash, Inc.,
Webster Hand Car Wash Corp., and Jenny Monteiro
Individually and as President of Tremont Car Wash, Inc.,
Webster Car Wash, Inc.,
Webster Hand Car Wash, Inc.,

Defendants

Plaintiff, Elaine L. Chao, Secretary of Labor, United States Department of Labor, brings this action under Sections 16(c) and 17 of the Fair Labor Standards Act of 1938, as amended, (29 U.S.C. §201, et seq.), ("the Act"), alleging that defendants violated sections 6, 7, 11(c), 15(a)(2), and 15(a)(5) of the Act.

I.

Jurisdiction of this action is conferred upon the Court by Section 17 of the Act and 28 U.S.C. Sections 1331 and 1345.

II.

Defendant LMC, also known as Lage Management Corporation, is a corporation organized under the laws of the State of New York having its principal office and place of business at 4391 Boston Post Road, Pelham Manor, New York 10803 within the jurisdiction of this court, where it is engaged in the business of operating car washes, lube shops and related activities, including owning subsidiary separately incorporated car washes and lube shops.

III.

Defendant Atlantic Auto Care Center, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 2591 Atlantic Avenue, Brooklyn, New York 11207-2414 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities, including owning subsidiary separately incorporated car washes and lube shops.

IV.

Defendant Boston Road Lube, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 2407 Boston Road, Bronx, New York 10467 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

V.

Defendant Boulevard Car Wash of N.Y., Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 315 Grand Concourse, Bronx, NY 10451 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

VI.

Defendant Bronx River Lube, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 4300 Bronx Boulevard, Bronx, NY 10466 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

#### VII.

Defendant First Avenue Lube Corp. is a corporation organized under the laws of the State of New York having its principal office and place of business at 334 East 109<sup>th</sup> Street, New York, NY 10001 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

#### VIII.

Defendant Michael's Car Wash, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 36-21 21<sup>st</sup> Street, Astoria, NY 11106 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

IX.

Defendant Midnight Express Lube, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 90-55 Desarc Road, Ozone Park, NY 11417 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

X.

Defendant 613 Car Wash Corp. is a corporation organized under the laws of the State of New York having its principal office and place of business at 613 North Avenue, New Rochelle, NY 10804 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

XI.

Defendant VIP Wash & Lube, Inc. is a corporation organized under the laws of the State of New York having its principal office at 1650 Bushwick Avenue, Brooklyn, NY 11207 and a place of business at 452 South Avenue Staten Island, NY 10303 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

XII.

Defendant Tremont Car Wash, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 1095 East Tremont Avenue, Bronx, NY 10460 within the jurisdiction of this court, where it is engaged in business as a car wash and related activities.

XIII.

Defendant Webster Car Wash, Inc. is a corporation organized under the laws of the State of New York having its principal office and place of business at 1783 Webster Avenue, Bronx, NY 10457 within the jurisdiction of this court, where it is engaged in business as a car wash and related activities.

#### XIV.

Defendant Webster Hand Car Wash Corp. is a corporation organized under the laws of the State of New York having its principal office and place of business at 2669-2673 Webster Avenue, Bronx, NY 10458 within the jurisdiction of this court, where it is engaged in business as a car wash and lube shop and related activities.

#### XV.

Defendant John Lage, who resides at 85 Lakeshore Drive, Eastchester, New York 10709-5208 and who maintains a principal office and place of business at 4391 Boston Post Road, Pelham Manor, New York 10803 within the jurisdiction of this court is president of the defendant corporations Atlantic Auto Care Center, Inc., Auto Care Lubes, Ltd., Boston Road Lube, Inc., Boulevard Car Wash of N.Y., Inc., Bronx River Lube, Inc., First Avenue Lube Corp., Michael's Car Wash, Inc., Midnight Express Lube, Inc., 613 Car Wash Corp., LMC also known as Lage Management Corporation; acted directly and indirectly in the corporations' interests in relation to their employees, and was thus an employer of the employees within the meaning of section 3(d) of the Act. Defendant John Lage also own shares in and is an investor in defendant corporations VIP Wash & Lube, Inc., Tremont Car Wash, Inc., Webster Car Wash, Inc. and Webster Hand Car Wash, Inc.

#### XVI.

Defendant Valdemiro Santos, who maintains a principal office at 1650 Bushwick Avenue, Brooklyn, NY 11207 and a place of business at 452 South Avenue Staten Island, NY 10303 within the jurisdiction of this court is president of the defendant corporation VIP Wash &

Lube, Inc., acted directly and indirectly in the corporation's interests in relation to its employees, and was thus an employer of the employees within the meaning of section 3(d) of the Act.

#### XVII.

Defendant Jenny Monteiro, who maintains a principal offices and places of business at 1095 East Tremont Avenue, Bronx, NY 10460, 1783 Webster Avenue, Bronx, NY 10457, and 2669-2673 Webster Avenue, Bronx, NY 10458, within the jurisdiction of this court is president of the defendant corporations Tremont Car Wash, Inc., Webster Car Wash, Inc. and Webster Hand Car Wash, Inc., acted directly and indirectly in the corporation's interests in relation to their employees, and was thus an employer of the employees within the meaning of section 3(d) of the Act.

#### XVIII.

Defendant corporation LMC, also known as Lage Management Corporation, has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XIX.

Defendant corporation Atlantic Auto Care Center, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XX.

Defendant corporation Boston Road Lube, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXI.

Defendant corporation Boulevard Car Wash of N.Y., Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXII.

Defendant corporation Bronx River Lube, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXIII.

Defendant corporation First Avenue Lube Corp. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXIV.

Defendant corporation Michael's Car Wash, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act..

#### XXV.

Defendant corporation Midnight Express Lube, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXVI.

Defendant corporation 613 Car Wash Corp. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXVII.

Defendant corporation VIP Wash & Lube, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXVIII.

Defendant corporation Tremont Car Wash, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act..

#### XXIX.

Defendant corporation Webster Car Wash, Inc. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXX.

Defendant corporation Webster Hand Car Wash Corp. has regulated the employment of all persons employed by said corporation, acted directly and indirectly in the corporation's interest in relation to said employees, and was thus an employer of said employees within the meaning of section 3(d) of the Act.

#### XXXI.

The business activities of the defendants are related and performed through unified operation or common control for a common business purpose and constitute an enterprise within the meaning of section 3(r) of the Act.

#### XXXII.

The business activities of the defendants LMC, also known as Lage Management Corporation, Atlantic Auto Care Center, Inc., Auto Care Lubes, Ltd., Boston Road Lube, Inc., Boulevard Car Wash of N.Y., Inc., Bronx River Lube, Inc., First Avenue Lube Corp., Michael's Car Wash, Inc., Midnight Express Lube, Inc., 613 Car Wash Corp., and John Lage, are related and performed through unified operation or common control for a common business purpose and constitute an enterprise within the meaning of section 3(r) of the Act.

#### XXXIII.

The business activities of the defendants VIP Wash & Lube, Inc., and Valdemiro Santos, and John Lage are related and performed through unified operation or common control for a common business purpose and constitute an enterprise within the meaning of section 3(r) of the Act.

#### XXXIV.

The business activities of the defendants Tremont Car Wash, Inc., Webster Car Wash, Inc., Webster Hand Car Wash Corp. and Jenny Monteiro and John Lage are related and performed through unified operation or common control for a common business purpose and constitute an enterprise within the meaning of section 3(r) of the Act.

#### XXXV.

Defendants employ employees at their places of business in the activities of the enterprise engaged in commerce or in the production of goods for commerce, including employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce. The enterprise has an annual gross volume of sales made or business done in an amount not less than \$500,000.00 Therefore, the employees are employed in an

enterprise engaged in commerce or in the production of goods for commerce within the meaning of section 3(s)(1)(A) of the Act.

#### XXXVI.

Defendants LMC, also known as Lage Management Corporation, Atlantic Auto Care Center, Inc., Auto Care Lubes, Ltd., Boston Road Lube, Inc., Boulevard Car Wash of N.Y., Inc., Bronx River Lube, Inc., First Avenue Lube Corp., Michael's Car Wash, Inc., Midnight Express Lube, Inc., 613 Car Wash Corp., and John Lage employ employees at their places of business in the activities of the enterprise engaged in commerce or in the production of goods for commerce, including employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce. The enterprise has an annual gross volume of sales made or business done in an amount not less than \$500,000.00 Therefore, the employees are employed in an enterprise engaged in commerce or in the production of goods for commerce within the meaning of section 3(s)(1)(A) of the Act.

#### XXXVII.

Defendants VIP Wash & Lube, Inc., and Valdemiro Santos, and John Lage employ employees at their places of business in the activities of the enterprise engaged in commerce or in the production of goods for commerce, including employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce. The enterprise has an annual gross volume of sales made or business done in an amount not less than \$500,000.00 Therefore, the employees are employed in an enterprise engaged in commerce or in the production of goods for commerce within the meaning of section 3(s)(1)(A) of the Act.

#### XXXVIII.

Defendants Tremont Car Wash, Inc., Webster Car Wash, Inc., Webster Hand Car Wash Corp. and Jenny Monteiro and John Lage employ employees at their places of business in the activities of the enterprise engaged in commerce or in the production of goods for commerce, including employees handling, selling, or otherwise working on goods or materials that have been moved in or produced for commerce. The enterprise has an annual gross volume of sales made or business done in an amount not less than \$500,000.00 Therefore, the employees are employed in an enterprise engaged in commerce or in the production of goods for commerce within the meaning of section 3(s)(1)(A) of the Act.

#### XXXIX.

Defendants in many workweeks, willfully and repeatedly violated, and are still violating, the provisions of sections 6 and 15(a)(2) of the Act by paying many of their employees employed in an enterprise engaged in commerce or in the production of goods for commerce, wages at rates less than the applicable statutory minimum rate prescribed in Section 6 of the Act and thus, defendants are liable for unpaid minimum wage compensation owing to their employees under section 6 of the Act and an additional equal amount as liquidated damages pursuant to section 16(c) of the Act or, in the event liquidated damages are not awarded, unpaid minimum wages and prejudgment interest on the unpaid minimum wages under section 17 of the Act.

#### XL.

Defendants in many workweeks willfully and repeatedly have violated, and are still violating, the provisions of sections 7 and 15(a)(2) of the Act by employing many of their employees employed in an enterprise engaged in commerce or in the production of goods for commerce, for workweeks longer than those prescribed in section 7 of the Act without

compensating the employees for their employment in excess of the prescribed hours at rates not less than one and one-half times the regular rates at which they are employed. Therefore, defendants are liable for unpaid overtime compensation and an equal amount in liquidated damages under section 16(c) of the Act, or, in the event liquidated damages are not awarded, unpaid overtime compensation and prejudgment interest on said unpaid overtime compensation under section 17 of the Act.

#### XLI.

Defendants willfully and repeatedly are violating the provisions of sections 11(c) and 15(a)(5) of the Act, in that defendants failed to make, keep, and preserve adequate and accurate records of their employees and of the wages, hours, and other conditions of employment which they maintained as prescribed by the Regulations issued and found at 29 CFR Part 516; more specifically, the records kept by the defendants failed to show adequately and accurately, among other things, the hours worked each workday, the total hours worked each workweek, the regular rate of pay, the basis upon which wages were paid, the total straight-time earnings for each workweek, and/or the total overtime compensation for each workweek, with respect to many of their employees.

#### XLII.

Defendants LMC, also known as Lage Management Corporation, Atlantic Auto Care Center, Inc., Auto Care Lubes, Ltd., Boston Road Lube, Inc., Boulevard Car Wash of N.Y., Inc., Bronx River Lube, Inc., First Avenue Lube Corp., Michael's Car Wash, Inc., Midnight Express Lube, Inc., 613 Car Wash Corp.,; and John Lage, Individually and as President since March 16, 2002 willfully and repeatedly have violated the provisions of the Act as alleged above.

#### XLIII.

Defendants VIP Wash & Lube, Inc., and Valdemiro Santos, individually and as president since June 20, 2003 willfully and repeatedly have violated the provisions of the Act as alleged above.

#### XLIV.

Defendants Tremont Car Wash, Inc., Webster Car Wash, Inc., Webster Hand Car Wash Corp. and Jenny Monteiro, individually as president, since June 20, 2003 willfully and repeatedly have violated the provisions of the Act as alleged above.

WHEREFORE, cause having been shown, plaintiff prays for judgment against defendants providing the following relief:

- (1) For an injunction issued pursuant to section 17 of the Act permanently restraining defendants, their officers, agents, servants, employees, and those persons in active concert or participation with defendants, from violating the provisions of sections 6, 7, 11, 15(a)(2), and 15(a)(5) of the Act; and
- (2) For an order pursuant to section 16(c) of the Act finding defendants liable for unpaid minimum wage and overtime compensation found due defendants' employees listed on the attached Exhibit A and an equal amount of liquidated damages (additional unpaid minimum wages and overtime compensation and liquidated damages may be owed to certain employees presently unknown to plaintiff for the period covered by this Complaint); or, in the event liquidated damages are not awarded;
- (3) For an injunction issued pursuant to section 17 of the Act restraining defendants, their officers, agents, servants, employees, and those persons in active concert or participation

with defendants, from withholding the amount of unpaid minimum wages and overtime compensation found due defendants' employees and prejudgment interest computed at the underpayment rate established by the Secretary of Treasury pursuant to 26 U.S.C. §6621; and

- (4) For an order awarding plaintiff the costs of this action; and
- (5) For an order granting such other and further relief as may be necessary and appropriate.

DATED: June 19, 2006

New York, New York

HOWARD M. RADZELY

Solicitor of Labor

PÁTRICIA M. RODENHAUSEN

Regional Solicitor

EVAN R. BAROUH (ERB 7257)

Senior Trial Attorney

U.S. Department of Labor Attorneys for Plaintiff.

POST OFFICE ADDRESS:

Patricia M. Rodenhausen Regional Solicitor U.S. Department of Labor 201 Varick Street, Room 983 New York, New York 10014 Tel. 212-337-2087 FAX 212-337-2112

#### EXHIBIT A

# Boston Road Lube, Inc. 2407 Boston Road Bronx, NY 10467

Manuel Salazar

Alberto Vasquez

Basu Tal

Jose Luis Serrano

Jose Gaitau

Julio Cesar Saldana

Jorge Selaya

Ignacio Macuitl

Carlos Saldona

Oscar

Enrique

Nelson

Delfino Godines

Jose H Giatan

Ciro Perez

Jose Antonio Getan

Pedro Cavanias

Seamons Errera Castillo

Carlos Saldana

Jorge Adrian Solaya

# First Avenue Lube Corp. 334 East 109<sup>th</sup> Street New York, NY 10001

Daniel Montero

Paulino Cabrera

Amos

Angel Atariguana

Hilberto Gustas

Ermalindo Valera

Angel Garcia

David De Los Santos

Perciano Sandovall

Panfilo Sandovall

Claudio Calindo

Noe Cuella Flores

Alturo Balderas

Bonifacio Cuellar

**	•		$\sim$	44	
Ben	ıam	m	$\Box$ 11	ellai	r

Sissoko

Doko Kote

Sasar

Martinez

Bueao J

Felipe

Jose

Eusedio

Diego

Alexander

Saidu

Ruben

Julio

Jose D Lemus Cruz

Mustafa Doucoure

Usef Dramin

Ibrahim Fofana

Charles Kofiowusu

Mario

Danny

Coffi

Junior

Mohammed

Vier

Salim

Adam

Lourdes

Minerva

Diego Valdemora

# Michael's Car Wash, Inc. 36-21 21st Street

# Astoria, NY 11106

Fernando (DM)

Campos Federico

Campos Francisco

Ziggy

Pedro

Pineda Hildo

Levy Zoar

Zelaya Hilario

Vargas Nicholas

Martin Dominguez

Melara Manuel

Jovel Dagoberto

Jose Francisco Campos

Serafin

Menjivar

Bolivar

Ivo De Sousa Costa

Nicolas Keana Vargas

Jaime

Caballo

Elario

Fausto

Jorge

Martinez

Serrano Manuel

Maldonado

Manuel Melara

Hilario Zelaya

Hugo Campos

Adrian Molano Mendez

Martin Luis Hernandez

Ceasar Sosa

Angel Roya

Arturo Trinidad

Jaime Licona

Estevan Almanza

Guillermo Tiburcio

Alejandro Perez

Jorge Ulantiniso

Anacleto Jimenez

Jose Sosaro

Jose Luis Perez

Juan Cabanas

Mario Dela Cruz

Hildo Pineda (night)

Amede Quedraogo

Momodou Gassama

### Boulevard Car Wash of N.Y., Inc. 315 Grand Concourse

# Bronx, NY 10451

Rafael Arellano

Modibo Camara

Biran Laye

Ousman Samasa

Luis T Morales

Alberto

Mousa

Soukuna

Golle

Lasana

Jabbie Musa

Martin K

Romi

Abdulea

Manu

Lendor

Bousseye Diagouraga

Jose Oscar

Banov Camara

Mohammed Cowi

Suresh Lal

Ibrahim Hakizimana

Jaime

Miguel Guzman

Romero Guzman

Castrulo Molina

Jose Jovel

Edwin Rodriguez (Chema)

Andres Molina

Adilio Valencia

Eduardo Morales

Victor Sanches

Carlos Monterosa

Carlos M Jovel

William Guzman

Rene Salamia

Numa Sohna (NM)

Abula Wsshe

Miguel

Manuel Gordillo

Orlando Castro

Mohammed Sona

Eric

Antonio Tobar

Salib Galub

Eddy Jovel

Sillah Basakiu

Salvadore Campos

Milton Cardenas (DM)

Buliy Ceesay Cashiers Marleny Guzman Jane Doe John Doe

## Bronx River Lube, Inc. 4300 Bronx Boulevard Bronx, NY 10466

Bouyagui Gory

Mohammed Bello

Ben

Emba

Elvis

Doucoure Demba

Osmar Ovelar

Hamed

Dioumas

Domingo

Wague

Koumba

Sekou

Ismalia

Ernesto Reyes

Jose Orlando Ortiz Nunez

Rigoberto Perez

Mauro Flores

Edwardo Alvarez

Bernardo Artiga

Luis Alonso Artiga

Miguel Martinez

Felix Adan Soriano

Louis Swasti

Isaiahs Mora

Osvaldo Pesantes (NM)

Roman Fajardo

Beningo Palacio

Gregorio Perez Isayas

Cristian Rios

Juan Mena

Osmin

Orlando O

Sergio G.

Josi

Emeterio

Avila

Pascual

Moises

Flo

Juan A.

Vicente

Marcelo

Victor

Humberto Ortiz

Josefat

Alex

Alonso

Oswaldo

Ramos Lemo

Cristian Rios

Jose A. Mena

Jose Soriano

Carlos Ayala

Fernando Martinez

Miguel Artiga

Carlos Ayala

Roberto Guevara

Nalini Khooblall

Jessica

Georgina D. Baldermora

Andrea Villon

Eduardo Ladines

Javier Flores

# Atlantic Auto Care Center, Inc. 2591 Atlantic Avenue Brooklyn, NY 11207-2414

#### John Doe 1

John Doe 2

John Doe 3

John Doe 4

John Doe 5

John Doe 6

Mario Morales

Juan Jesus

Jose Sandoval

Armando Samora

John Doe 1 (night)

John Doe 2 (night)

John Doe 3 (night)

John Doe 4 (night)

John Doe 5( night)

John Doe 1 (day)

John Doe 2 (day)

John Doe 3 (day)

John Doe 4 (day)

John Doe 5 (day)

John Doe 6 (day)

John Doe 7 (day)

John Doe 8 (day)

John Doe 9 (day)

John Doe 10 (day)

John Doe 11 (day)

John Doe 12 (day)

John Doe 13 (day)

John Doe 14 (day)

John Doe 1(Day)

John Doe 2(night)

# Midnight Express Lube, Inc. 90-55 Desarc Road

# Ozone Park, NY 11417

Jobbi

Miguel Marin

Sham

Mahamadou Tounkara

Wilson Manzano

Rudy Maharaj

Charles Kofi Owusu

Mahamadou Koita

Baboucar Taal

Jose Blandon

Eitan Iraeli

Modibu

Missa

Lassana Coulibaly

Esa

Robson Miranda

Francisco

Julio

Jorge

Silbino

Seth Roque

Walter

Cruz Aviles

Erasmo Eufracio

Jose

Helder Borges

Mario Roque

Juan Moreno

Carlos Coreas

George Orellana

Geraldo Moreno

Frey Rincon

Javier Nava

Fortino

Javier Rocque

Efrain Rincon Dominquez

Ricardo Alas Molina

Exjavier Sanches

Sergio Rafael

Victor

Cristobal

Casimiro

Carlos

Abel

Segundo

Osbaldo

Ramon Regalado

Augustin

Valentin Angel

Ernesto Marin

Barbara

Marisha

Paola

Daniel

# 613 Car Wash Corp.

# 613 North Avenue

# New Rochelle, NY 10804

Nelson Orellana

Roberto Maravilla

Juan Medina

Salvadore Campos

Carlos Martinez

Jose Francisco

Mardo Robles - (NM)

Bolivar

Abelino

Erminio

Amaldo

Pablo

Norberto

Mario

Salvator E. Melava

Efrain Gonzalez

Rosario Gonzalez

Marleny Guzman

Yazmin Fernandez

Mario Morales

Juan Jesus

Jose Sandoval

Armando Samora

## VIP Wash & Lube, Inc. 452 South Avenue Staten Island, NY 10303

Antonio Acevedo

Raul Anatasio

Carlos Calero

Boubacar Camara

Juan Carlos

Oscar Cautivo

Baldemero Divera

Artenio Doe

Fernando Doe

Lisette Echevers

Lorenzo Esquivel

Johnny Figuieoa

Eddie Garcia

Luis Garcia

Emilio Guzman

Roberto Guzman

Alex Hernandez

Manuel Hernandez

Geraldo Jay

Edgar Jiminez

Hector Lionel

Raul Lopez

Susan Mack

Marcelo Medina

**Eddie Mints** 

Salvador Nanco

Gustavo Perez

Valarie Ramirez

Charise Rand

Manuel Rodriguez

Shanta Roper

Artur Saloj

Carlos Saloi

Kristle Sanchez

Laurie Sanchez

Walker Terrance

Bernadino Valasco

Alfredo Velasco

Manny Velasquez

Rosa Venancio

### Tremont Car Wash, Inc. 1095 East Tremont Avenue Bronx, NY 10460

Ismael Villanueva

Kerin Zelaya

Marcos Tulio

Keita Diaye

Alfred Doe

Samala Doe

Bekeya Doe

Giovani Doe

Joel Doe

Josue Doe

Sacko Doe

Prospev Doe

Nery Alexander Doe

Malranador Doe

Papa Doe

Reymundo Doe

Semga Doe

Jose Carbajal

Jose Domingo

Geraro Martinez

Bulmaro Velasquez

Thima Cisse

Armando Molina
Juan Antonio Molina
Sergio Lopez
Kane Sekou
Basiku Sillah
Maria Luisa Benitez
Manga Mory Sylla
Essa Jagana
Guillermo Melendez

## Webster Car Wash, Inc 1783 Webster Avenue Bronx, NY 10457

Benancio Antonio Tiburcio

Armando Aquino

Jose Arsenio Rodriguez

Amara Cisse

Robert Correa

Hamedi Doe

Jawara Doe

Kass Doe

Kebe Doe

Mossi Doe

Pulo Doe

Richard Doe

Sacko Doe

Samba Doe

Josue Guerra

Aboubacar Hamani

Oscar Lopez

Bah Mamdou Bhoye

Alfredo Martinez Garcia

Gladys Paz

Jose Rafael Mejia

Juan Ramon Hidalgo

Belkys Rosado

Ernesto Salazar

Alberto Teodoro

Diallo Malla

# Webster Hand Car Wash Corp. 1865 Webster Avenue Bronx, NY 10457

Carlos Alexander Salazar Espinoza
Daniel Barrera
Antonio Benitez
Clemente Bonilla
Hamani Boukarie
Joel Cortez
Miriam Doe
Maria Dun Bhoke
Jesus Lozano
Rodolfo Ernesto Salazar
Timoteo San Juan
Alejandro Tredo

#### ATTACHMENT

- LMC also known as Lage Management Corporation 4391 Boston Post Road Pelham Manor, New York 10803
- Atlantic Auto Care Center, Inc. 2591 Atlantic Avenue Brooklyn, New York 11207-2414
- 3. Boston Road Lube 2407 Boston Road Bronx, New York 10467
- 4. Boulevard Car Wash of N.Y. Inc. 315 Grand Concourse Bronx, New York 10451
- Bronx River Lube Inc.
   4300 Bronx Boulevard
   Bronx, New York 10466
- First Avenue Lube Corp.
   334 East 109<sup>th</sup> Street
   New York, New York 10001
- Michael's Car Wash, Inc. 36-21 21<sup>st</sup> Street Astoria, New York 11106
- Midnight Express Lube, Inc.
   90-55 Desarc Road
   Ozone Park, New York 11417
- 613 Car Wash Corp.
   613 North Avenue
   New Rochelle, New York 10804
- VIP Wash & Lube, Inc.
   1650 Bushwick Avenue
   Brooklyn, New York 11207
   d/b/a 452 South Avenue
   Staten Island, New York 10303

- 11. Tremont Car Wash, Inc. 1095 East Tremont Avenue Bronx, New York 10460
- 12. Webster Car Wash, Inc.1783 Webster AvenueBronx, New York 10457
- 13. Webster Hand Car Wash Corp. 2669-2673 Webster Avenue Bronx, New York 10458
- 13. John Lage85 Lakeshore DriveEastchester, New York 10709-5208
- 14. Valdemiro Santos 1650 Bushwick Avenue Brooklyn, New York 11207

-and also-

452 South Avenue Staten Island, New York 10303

15. Jenny Monteiro1095 East Tremont AvenueBronx, New York 10460

-and also-

1783 Webster Avenue Bronx, New York 10457

-and also-

2669-2673 Webster Avenue Bronx, New York 10458